

**WARNING LETTER
AND
NOTICE OF AMENDMENT**

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

December 11, 1996

Mr. Jim Elmore
Vice President
Koch Pipeline LP
P.O. Box 2256
Wichita, KS 67201

CPF No. 36528

Dear Mr. Elmore:

On September 25-27, 1996, a representative of the Central Region Office of Pipeline Safety (OPS), pursuant to Chapter 601 of 49 United States Code, conducted an onsite pipeline safety inspection of your pipeline facilities and records on the natural gas liquids system located in Kansas.

As a result of the inspection, it appears that you have committed probable violations, as noted below, of pipeline safety regulations, Title 49, Code of Federal Regulations, Part 195. The items inspected and the probable violations are:

1. **§ 195.402(c) Procedural manual for operations, maintenance, and emergencies.**

Operators are required to prepare and follow written procedures for conducting normal operations and maintenance activities and handling abnormal operations, per § 195.402(a). The manual required by paragraph (a) of this section must include procedures as required by § 195.402(c).

(A) § 195.226 Welding: Arc Burns

Koch's welding procedures did not state that a ground wire must be attached to the pipe by means other than

welding as required by § 195.226(c).

(B) § 195.266 Construction records.

Koch's procedures for nondestructive testing did not contain the provision that the operator must maintain records of the total number of girth welds and the number nondestructively tested, including the number rejected and the disposition of each rejected weld.

(C) § 195.416 External corrosion control.

Koch's procedures for cathodic protection did not include the provision for taking into consideration IR Drop. In addition, Koch's procedures for shorted casings did not include a criteria to determine that casings are shorted.

2. § 195.428 Overpressure safety devices.

§ 195.428(a) requires that each operator shall inspect and test each pressure limiting device, relief valve, pressure regulator, or other item of pressure control equipment to determine that it is functioning properly, is in good mechanical condition, and is adequate from the standpoint of capacity and reliability of operation for the service in which it is used, at intervals not to exceed 7 ½ months, but at least twice each calendar year for highly volatile liquid pipelines.

At the Scott City Station, Koch inspected the discharge pressure switch, which serves as the primary over-pressure protection device, on 6/14/95 and then on 4/10/96 which exceeded 7 ½ months by 2 months and 13 days. At the Greensburg Station, Koch conducted only one inspection for the discharge pressure switch during calendar year 1995, which was on 6/19/95. Koch had inspected this same pressure switch twice for the calendar year 1994.

Under 49 United States Code § 60122, you are subject to a civil penalty not to exceed \$25,000 for each violation for each day the violation persists up to a maximum of \$500,000 for any related series of violations.

We have reviewed the circumstances and supporting documents involved for the violation numbered 2 in this case, and have decided not to assess you a civil penalty. We advise you, however, that should you not correct the circumstances leading to

the violation, we will take enforcement action when and if the continued violation comes to our attention.

In regard to item numbered 1, relating to deficiencies in your written procedures for operations, maintenance, and emergencies, the Office of Pipeline Safety is issuing to you a Notice of Amendment requiring that your procedures be amended to comply with the requirements of the regulations referenced.

When it is found that an operator's procedures are inadequate, 49 C.F.R. § 190.237 provides that the operator, after notice and opportunity for hearing may be required to amend its plans and procedures. This letter serves to provide you with notice of the inadequate procedures and the response options as prescribed under § 190.237. The operator is allowed thirty (30) days after receipt of such notice to submit written comments or request a hearing. After considering the material presented, the Office of Pipeline Safety is required to notify the operator of the required amendment or withdraw the notice proposing the amendment. If you do not desire to contest the notice, please provide the revised procedures within thirty (30) days of receipt of this notice.

Sincerely,

Ivan A. Huntton
Director, Central Region
Office of Pipeline Safety